

FILED

NOV - 2 2023

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY *[Signature]* DEPUTY CLERK

United States District Court
Western District of Texas
El Paso Division

United States of America,
Plaintiff,

v.

Eduardo Quintana-Sotelo,
Defendant.

EP-23-M-3535-RFC

**United States' Motion to Detain Defendant Without
Bond and Motion for Continuance**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant was arrested for a violation of Title 18, United States Code, Section 933, *Firearms Trafficking*.
2. The Defendant is a United States Citizen, however has strong ties to Mexico, and cannot demonstrate sufficient employment, length of residence in the community, or community ties, and, as such, presents a high risk of fleeing the jurisdiction to avoid prosecution on this charge.
3. The Defendant has a prior criminal history.
4. There are no conditions or combination of conditions which will reasonably assure the safety of the community should the Defendant be released on bond.
5. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

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UNITED STATES ATTORNEY

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